Claims 49 and 50 are rejected under 35 U.S.C. §112, second paragraph, for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Particularly, the Examiner states that the metes and bounds of claims are undefined because there is no weight percent range for carbon, vanadium, niobium, cobalt, boron or manganese. The claims have been amended to address this issue (plus the argument for manganese) and withdrawal of the rejection is therefore respectfully requested.

Claims 1 and 34 are objected to under 35 U.S.C. §1.75 as being a substantial duplicate of claims 4 and 12, respectfully. The Examiner also notes that claim 1 is a duplicate of claim 7, 8, 9 and 42. Applicant has canceled these claims obviating the rejection. Accordingly, withdrawal thereof is respectfully requested.

If any fee is due in conjunction with the filing of this response, Applicant authorizes deduction of that fee from Deposit Account No. 06-0308.

In view of the above, Applicant submits that this application is in condition for allowance and such action is respectfully requested.

Respectfully submitted,

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CERTIFICATE OF MAILING

I hereby certify that this **Amendment** is being deposited with the United States Postal Service as **first class mail** in an envelope addressed to: Assistant Commissioner For Patents, Washington, D.C. 20231, on May 22, 2000.

Georgeen B. George